

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: <i>Alisa Cawood v. Ethicon, Inc., et al.</i> 2:15-cv-00366 <i>Tina Holbert v. Ethicon, Inc., et al.</i> 2:16-cv-01494 <i>Loretta Koochagian v. Ethicon, Inc., et al.</i> 2:15-cv-03678 <i>Nelly Lorenzana, et al. v. Ethicon, Inc., et al.</i> 2:16-cv-01702 <i>Gwendalynn Miller, et al. v. Ethicon, Inc., et al.</i> 2:16-cv-01686 <i>Sheryl A. Rodriguez v. Ethicon, Inc., et al.</i> 2:14-cv-29223	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR ORDER REGARDING
DISPOSITION OF NON-REVISION GYNECARE TVT PRODUCT CASES**

NOW COME the above-referenced Plaintiffs, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson ("Ethicon") regarding the disposition of non-revision Gynecare TVT product cases (Doc. No. 5313), and state the following:

On March 2, 2018, Ethicon filed *Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (Doc. No. 5313), which proposes a disposition of cases in which plaintiff has not undergone a revision procedure. Accompanying the motion as

Exhibit A was a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named plaintiffs are included in Ethicon's list of plaintiffs who have not undergone a revision procedure. However, each of the above-named plaintiffs have undergone a revision procedure and are not properly included in Ethicon's motion. Plaintiff's counsel has informed Ethicon that the above-named plaintiffs are not properly included in Defendants' motion pertaining to non-revision cases. Plaintiffs file this response to preserve their claims and avoid dismissal to the extent that Ethicon's motion is granted.

Dated: March 16, 2018

Respectfully submitted,

s/Rhett A. McSweeney

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